

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE  
LITIGATION

21 MC 102

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DAVID PEREZ- ZAPATOS,

08 CIV 2686

Plaintiffs,

- against -

80 LAFAYETTE ASSOCIATES, LLC, ALAN  
KASMAN DBA KASCO, AMERICAN EXPRESS  
BANK, LTD, AMERICAN EXPRESS  
COMPANY, AMERICAN EXPRESS TRAVEL  
RELATED SERVICES COMPANY, INC., ANN  
TAYLOR STORES CORPORATION, B.R. FRIES  
& ASSOCIATES, INC., BATTERY PARK CITY  
AUTHORITY, BFP ONE LIBERTY PLAZA CO.,  
LLC., BFP TOWER C CO. LLC, BFP TOWER C  
MM LLC, BLACKMON-MOORINGSTEAMATIC  
CATASTROPHE, INC D/B/A BMS  
CAT, BLUE MILLENNIUM REALTY LLC,  
BROOKFIELD FINANCIAL PROPERTIES, INC.,  
BROOKFIELD FINANCIAL PROPERTIES, LP,  
BROOKFIELD PARTNERS, LP, BROOKFIELD  
PROPERTIES CORPORATION, BROOKFIELD  
PROPERTIES HOLDINGS INC., CENTURY 21,  
INC, ENVIROTECH CLEAN AIR, INC.,  
GENERAL RE SERVICES CORP., GPS  
ENVIRONMENTAL CONSULTANTS, INC,  
GRUBB & ELLIS MANAGEMENT SERVICES,  
HILLMAN ENVIRONMENTAL GROUP, LLC,  
INDOOR ENVIRONMENTAL TECHNOLOGY,  
INC., KASCO RESTORATION SERVICES CO.,  
LEHMAN BROTHERS HOLDINGS INC.,  
LEHMAN BROTHERS, INC., LEHMAN  
COMMERCIAL PAPER, INC., MAYORE  
ESTATES LLC, MAYORE ESTATES LLC AND  
80 LAFAYETTE ASSOCIATION LLC  
ASTENANTS IN COMMON, MERRILL LYNCH  
& CO, INC, NATIONAL ASSOCIATION OF  
SECURITIES DEALERS, INC., NEW LIBERTY  
PLAZA LP, NEW YORK CITY INDUSTRIAL  
DEVELOPMENT AGENCY, NEW YORK CITY  
INDUSTRIAL DEVELOPMENT  
CORPORATION, NOMURA HOLDING

AMERICA, INC., NOMURA SECURITIES INTERNATIONAL, INC., ONE LIBERTY PLAZA, STONER AND COMPANY, INC., STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC., THE BOARD OF MANAGERS OF THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), THE ONE LIBERTY PLAZA CONDOMINIUM (COKDO #1178), TOSCORP INC., TRAMMELL CROW COMPANY, TRAMMELL CROW CORPORATE SERVICES, INC., TUCKER ANTHONY, INC., WESTON SOLUTIONS, INC., WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY PLAZA, CO. GP, CORP., WFP RETAIL CO. G.P. CORP., WFP RETAIL CO.L.P., WFP TOWER A CO., WFP TOWER A CO. G.P. CORP., WFP TOWER A. CO., L.P., WFP TOWER B CO. G.P. CORP., WFP TOWER B HOLDING CO., LP, WFP TOWER B. CO., L.P., AND WORLD FINANCIAL PROPERTIES, L.P., ET AL

Defendants.

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#### **ENVIROTECH CLEAN AIR'S ANSWER TO COMPLAINT BY ADOPTION**

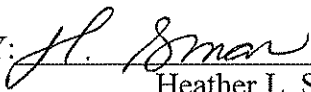
PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. ("Envirotech"), as and for their responses to the allegations set forth in the Complaint by Adoption ("Check-off Complaint") related to the Master Complaint filed in the above-referenced action, hereby adopts Envirotech's Answer to the Master Complaint dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York  
May 28, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT  
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BY:   
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